

EXHIBIT 55

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party Plaintiff.

Case No. 22-cv-10019-JSR

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

**JPMORGAN CHASE BANK, N.A.’S
FOURTH SUPPLEMENTAL INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and the Civil Case Management Plan, Dkt. 16, Defendant/Third-Party Plaintiff JPMorgan Chase Bank, N.A. (“JPMorgan”) makes the following fourth supplemental initial disclosures to Plaintiff Jane Doe 1 (“Doe” or “Plaintiff”) and Third-Party Defendant James Edward Staley (“Staley” or “Third-Party Defendant”).

The disclosures made herein are based upon information reasonably available to JPMorgan at the present stage of this litigation and the issues as currently defined by the complaint. JPMorgan reserves the right to supplement, revise, or otherwise amend the

information contained herein as discovery continues.

By making these disclosures, JPMorgan does not represent that it is identifying every document, tangible thing, or witness that may be relevant to the issues in this action, or on which JPMorgan may rely in support of its claims or defenses. Nor does JPMorgan waive its rights to object to production of any document or tangible thing disclosed on the basis of any valid objection (including but not limited to any privilege, the work-product doctrine, relevancy, hearsay, undue burden, or any other proper ground) or its rights to object to the use of any information disclosed for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action. JPMorgan also reserves the right to object on any and all proper grounds to any other discovery request or proceeding involving or relating to the subject matter of these disclosures consistent with the Federal Rules of Civil Procedure and the Local Rules for the United States District Court for the Southern District of New York.

JPMorgan's disclosures represent its good faith effort to identify information it reasonably believes is required by Fed. R. Civ. P. 26(a)(1). The disclosures set forth below are made subject to the above objections and qualifications.

I. INDIVIDUALS WITH KNOWLEDGE

Based on information reasonably available at this time, JPMorgan identifies the following individuals who may be likely to have discoverable information that JPMorgan may use to support its claims or defenses, unless such use is solely for impeachment. In making these disclosures, JPMorgan does not waive its right to object, pursuant to any applicable Federal Rule of Civil Procedure or Local Rule, to the deposition or trial testimony of any of the individuals listed below.

JPMorgan does not consent to or authorize communication by the Plaintiff with the individuals identified below. Each of the individuals identified below can be reached

through counsel for JPMorgan.

Because discovery, investigation, and analysis of these matters is ongoing, JPMorgan reserves the right to supplement this information if additional information later becomes known and to designate and/or call further witnesses at trial. JPMorgan also reserves the right to seek discovery from, and relating to, other persons that may subsequently become known as persons likely to have discoverable information relevant to the disputed facts.

Name	Subject Matter
Corporate representative of JPMorgan Chase Bank, N.A.	JPMorgan's onboarding, retention, and exit of Jeffrey Epstein's accounts and accounts related to Jeffrey Epstein.
Corporate representative of JPMorgan Chase Bank, N.A.	JPMorgan's policies and procedures relating to the private bank's recruitment, onboarding, and retention of clients.
Corporate representative of JPMorgan Chase Bank, N.A.	JPMorgan's policies and procedures relating to monitoring and reporting account activity of private banking clients.
Corporate representative of JPMorgan Chase Bank, N.A.	JPMorgan's Anti-Money Laundering ("AML") Compliance program and AML Compliance policies and procedures.
Mary Erdoes (CEO Asset & Wealth Management)	JPMorgan's private banking client relationship with Jeffrey Epstein. Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein. ¹
William Langford* (former Director (Global Anti-Money Laundering); Global Head (Compliance); Head (Enterprise Financial Crimes Compliance); and General Counsel (Global Compliance and Regulatory Management))	AML compliance work that JPMorgan performed relating to Jeffrey Epstein's accounts and accounts related to Jeffrey Epstein. Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.
Patrick McHugh (Executive Director, JPMorgan Private Bank)	Transaction information relating to Jeffrey Epstein's account activity at JPMorgan and accounts related to Jeffrey Epstein.

¹ JPMorgan has identified those individuals who, at this point in the litigation, may have information uniquely related to its breach of fiduciary duty and faithless servant claims against Mr. Staley. All witnesses may have information related to the underlying claims of Doe for which JPMorgan seeks contribution or indemnity. JPMorgan does not waive its rights to further amend or supplement these disclosures through discovery.

Name	Subject Matter
Paul Morris* (former Banker (Private Bank))	JPMorgan's private banking client relationship with Jeffrey Epstein.
James Edward Staley* (former CEO (Private Bank); CEO (Investment Bank); CEO (Asset Management); Global Head (Asset & Wealth Management); Head (Private Bank))	<p>JPMorgan's private banking client relationship with Jeffrey Epstein.</p> <p>Jeffrey Epstein's involvement in recruiting other private banking clients for JPMorgan.</p> <p>Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.</p> <p>Knowledge of Jeffrey Epstein's activities as alleged by Plaintiff Jane Doe 1 and the United States Virgin Islands (in Case No. 22-cv-10904). Third-Party Defendant.</p>
Stephen Cutler* (former Executive Vice President, General Counsel)	<p>JPMorgan's private banking relationship with Epstein.</p> <p>JPMorgan's retention and exit of Jeffrey Epstein's accounts and accounts related to Jeffrey Epstein.</p> <p>Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.</p>
Mary Casey (Managing Director, Private Bank)	<p>JPMorgan's private banking client relationship with Jeffrey Epstein.</p> <p>Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.</p>
Justin Nelson (Managing Director and Head of Asset Management and Financial Principals Coverage, Private Bank)	<p>JPMorgan's private banking client relationship with Jeffrey Epstein.</p> <p>Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.</p>
Jonathan Schwartz* (Former General Counsel, Investment Bank)	Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.

* These individuals no longer work at JPMorgan and may be separately represented. To the extent these individuals are separately represented, JPMorgan will provide contact information for their counsel when available.

Catherine Keating* (former CEO, Private Bank)	Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.
John Duffy* (former CEO, Private Bank)	Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.
Anne Verdon (former General Counsel, Private Bank)	Mr. Staley's involvement in JPMorgan's banking relationship with Jeffrey Epstein.
Jane Doe 1 (Plaintiff)	Mr. Staley's alleged sexual abuse of Jane Doe 1 and others through his relationship with Jeffrey Epstein.
Jane Doe 1 (Plaintiff in Case No. 22-cv-10018)	Mr. Staley's alleged sexual abuse of Jane Doe 1 and others through his relationship with Jeffrey Epstein.
U.S. Customs and Border Protection	Information concerning passengers on Jeffrey Epstein's aircraft and visitors to his residence
Federal Bureau Of Investigation	Information concerning law enforcement actions and investigations into Epstein and related entities.
United States Attorney's Office For The Southern District Of New York	Information concerning law enforcement actions and investigations into Epstein and related entities.
United States Attorney's Office For The Southern District Of Florida	Information concerning law enforcement actions and investigations into Epstein and related entities.
Palm Beach Sheriff's Office	Information concerning law enforcement actions and investigations into Epstein and related entities.
Palm Beach Police Department	Information concerning law enforcement actions and investigations into Epstein and related entities.
Virgin Islands Department Of Justice	Information concerning law enforcement actions and investigations into Epstein and related entities.

Santa Fe County Sherriff's Office	Information concerning law enforcement actions and investigations into Epstein and related entities.
New York Police Department	Information concerning law enforcement actions and investigations into Epstein and related entities.
Manhattan District Attorney's Office	Information concerning law enforcement actions and investigations into Epstein and related entities.
The Epstein Estate	Information concerning Epstein and related entities.
The Epstein Victims Compensation Program	Information concerning claims made by victims against Epstein and their resolution.

In addition to the above-named individuals, all persons deposed in this case and other persons identified in the documents described in Section II below may have discoverable information that JPMorgan may use to support its claims or defenses. JPMorgan reserves the right to modify and supplement the foregoing list and to identify and call as witnesses additional persons if, during the course of discovery and investigation relating to this case, JPMorgan learns that such additional persons have knowledge or information that JPMorgan may use to support its claims or defenses.

Further, JPMorgan also reserves the right to call as witnesses individuals in addition to those identified herein to the extent such witnesses are required to authenticate an exhibit offered into evidence or to establish chain of custody of an exhibit offered into evidence. JPMorgan also may rely on expert witnesses, to be disclosed in accordance with Federal Rule of Civil Procedure 26(a)(2) and the Civil Case Management Plan, Dkt. 16, to support its claims or defenses. JPMorgan specifically reserves the right to call any deponent or declarant in this action as a trial witness to testify regarding matters covered in his/her deposition or declaration and/or to rely on any such testimony in support of its claims or defenses in this case. JPMorgan further specifically reserves the right to call any individual(s) identified in the Plaintiff's disclosures, including as amended.

II. CATEGORIES OF RELEVANT DOCUMENTS

At present, JPMorgan believes that the following documents, electronically stored information, and tangible things may be used to support JPMorgan's claims or defenses, unless such use is solely for impeachment. This disclosure does not include documents solely within the Plaintiff's or the Third-Party Defendant's possession, custody, or control. This disclosure does not include expert materials that may be or have been developed, which will be disclosed pursuant to Federal Rule of Civil Procedure 26(a)(2). This disclosure does not constitute an admission as to the existence, relevance, or admissibility of the identified materials or a waiver of any attorney- client privilege, work product protection, or other applicable privilege or immunity.

- 1) Documents, communications, and electronically stored information relating to JPMorgan's AML compliance program and other policies and practices.
- 2) Documents, communications, and electronically stored information relating to Jeffrey Epstein's accounts and accounts related to Jeffrey Epstein at JPMorgan.
- 3) Documents, communications, and electronically stored information relating to James Staley's employment, compensation, and duties at JPMorgan, including JPMorgan policies and codes of conduct.
- 4) Documents, communications, and electronically stored information relating to James Staley's communications with or about Jeffrey Epstein.

JPMorgan will make the foregoing documents available for inspection or copying at a time and place to be mutually agreed upon by the parties, subject to any applicable privacy or other restrictions and to the extent they are non-privileged and in JPMorgan's possession, custody, and control. JPMorgan has produced Mr. Staley's personnel file which includes Mr. Staley's Code of Conduct affirmations and information regarding Mr. Staley's compensation,

and points Mr. Staley to the following documents in support of its claims:

JPM-SDNYLIT-00178143–JPM-SDNYLIT-00178494

JPM-SDNYLIT-00202227–JPM-SDNYLIT-00204753

JPM-SDNYLIT-00204821–JPM-SDNYLIT-00204836

In addition to the above-described documents, JPMorgan expects that, during the course of discovery, experts will identify documents used to support their opinions pertaining to the issues in this case. Further, JPMorgan may rely upon publicly available documents and documents that have been identified in the initial disclosures of any other party or may be obtained through discovery or are otherwise produced by the Plaintiff and/or third parties.

Because discovery, investigation, and analysis of these matters are ongoing, JPMorgan expects to discover additional documents and/or tangible things upon which it may rely to support its claims or defenses, including documents from the Third-Party Defendant. JPMorgan therefore reserves the right to supplement this information accordingly.

Notwithstanding this identification of these categories of documents, JPMorgan reserves the right to object to any of the Plaintiff's discovery requests on related topics to the extent such requests are overly broad, unduly burdensome, and/or call for documents beyond the scope of JPMorgan's discovery obligations under the Federal Rules of Civil Procedure or the Local Rules, and/or any other applicable basis for objection.

III. CALCULATION OF DAMAGES

Doe v. JPMorgan:

Not applicable.

JPMorgan v. Staley:

As stated in its Third-Party Complaint, JPMorgan seeks the following damages from Staley:

- 1) All damages awarded to Plaintiff or any member of the purported class (together,

“Plaintiffs”), as discussed in Section C of Plaintiff’s Initial Disclosures dated December 22, 2022, and the amount JPMorgan will pay to the Plaintiffs to settle this action, in the amount of \$290,000,000.00.

- 2) Damages for breach of fiduciary duty, including the amount JPMorgan will pay to the Plaintiffs to settle this action, in the amount of \$290,000,000.00, and all costs of defending the *Jane Doe I v. JPMorgan Chase Bank, N.A.* litigation.²
- 3) All compensation paid by JPMorgan to Staley from 2006 through 2013, which JPMorgan has calculated at this time based on the documents it has produced (*see supra*) to be approximately not less than \$140,000,000.00.
- 4) Punitive damages in an amount to be determined at trial.

IV. INSURANCE

Insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy any judgment in this action have been made available for inspection and copying and can be found at the following Bates numbers:

² JPMorgan is currently determining the damages it has suffered and will suffer as a result of this litigation and will amend these disclosures when it has a reasonable calculation of those damages.

JPM-SDNYLIT-00762790	JPM-SDNYLIT-00763672	JPM-SDNYLIT-00764462
JPM-SDNYLIT-00762803	JPM-SDNYLIT-00763693	JPM-SDNYLIT-00764463
JPM-SDNYLIT-00762885	JPM-SDNYLIT-00763718	JPM-SDNYLIT-00764464
JPM-SDNYLIT-00762920	JPM-SDNYLIT-00763729	JPM-SDNYLIT-00764465
JPM-SDNYLIT-00762932	JPM-SDNYLIT-00763736	JPM-SDNYLIT-00764466
JPM-SDNYLIT-00762944	JPM-SDNYLIT-00763749	JPM-SDNYLIT-00764467
JPM-SDNYLIT-00762958	JPM-SDNYLIT-00763750	JPM-SDNYLIT-00764468
JPM-SDNYLIT-00762974	JPM-SDNYLIT-00763751	JPM-SDNYLIT-00764470
JPM-SDNYLIT-00763005	JPM-SDNYLIT-00763752	JPM-SDNYLIT-00764496
JPM-SDNYLIT-00763064	JPM-SDNYLIT-00763782	JPM-SDNYLIT-00764511
JPM-SDNYLIT-00763075	JPM-SDNYLIT-00763823	JPM-SDNYLIT-00764521
JPM-SDNYLIT-00763086	JPM-SDNYLIT-00763942	JPM-SDNYLIT-00764536
JPM-SDNYLIT-00763104	JPM-SDNYLIT-00763945	JPM-SDNYLIT-00764548
JPM-SDNYLIT-00763127	JPM-SDNYLIT-00763970	JPM-SDNYLIT-00764561
JPM-SDNYLIT-00763149	JPM-SDNYLIT-00763997	JPM-SDNYLIT-00764575
JPM-SDNYLIT-00763184	JPM-SDNYLIT-00764006	JPM-SDNYLIT-00764582
JPM-SDNYLIT-00763199	JPM-SDNYLIT-00764013	JPM-SDNYLIT-00764587
JPM-SDNYLIT-00763222	JPM-SDNYLIT-00764043	JPM-SDNYLIT-00764593
JPM-SDNYLIT-00763224	JPM-SDNYLIT-00764046	JPM-SDNYLIT-00764713
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JPM-SDNYLIT-00763244	JPM-SDNYLIT-00764101	JPM-SDNYLIT-00765068
JPM-SDNYLIT-00763257	JPM-SDNYLIT-00764102	JPM-SDNYLIT-00765186
JPM-SDNYLIT-00763288	JPM-SDNYLIT-00764103	JPM-SDNYLIT-00765305
JPM-SDNYLIT-00763326	JPM-SDNYLIT-00764104	JPM-SDNYLIT-00765434
JPM-SDNYLIT-00763337	JPM-SDNYLIT-00764105	JPM-SDNYLIT-00765587
JPM-SDNYLIT-00763352	JPM-SDNYLIT-00764106	JPM-SDNYLIT-00765588
JPM-SDNYLIT-00763353	JPM-SDNYLIT-00764133	JPM-SDNYLIT-00765721
JPM-SDNYLIT-00763357	JPM-SDNYLIT-00764156	JPM-SDNYLIT-00765735
JPM-SDNYLIT-00763373	JPM-SDNYLIT-00764188	JPM-SDNYLIT-00765864
JPM-SDNYLIT-00763375	JPM-SDNYLIT-00764308	JPM-SDNYLIT-00765871
JPM-SDNYLIT-00763388	JPM-SDNYLIT-00764332	JPM-SDNYLIT-00765876
JPM-SDNYLIT-00763395	JPM-SDNYLIT-00764341	JPM-SDNYLIT-00765880
JPM-SDNYLIT-00763408	JPM-SDNYLIT-00764366	JPM-SDNYLIT-00765886
JPM-SDNYLIT-00763526	JPM-SDNYLIT-00764397	JPM-SDNYLIT-00766054
JPM-SDNYLIT-00763564	JPM-SDNYLIT-00764414	JPM-SDNYLIT-00766187
JPM-SDNYLIT-00763565	JPM-SDNYLIT-00764440	JPM-SDNYLIT-00766193
JPM-SDNYLIT-00763566	JPM-SDNYLIT-00764443	JPM-SDNYLIT-00766336
JPM-SDNYLIT-00763596	JPM-SDNYLIT-00764444	JPM-SDNYLIT-00766362
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JPM-SDNYLIT-00763608	JPM-SDNYLIT-00764452	JPM-SDNYLIT-00766403
JPM-SDNYLIT-00763615	JPM-SDNYLIT-00764453	JPM-SDNYLIT-00766410
JPM-SDNYLIT-00763632	JPM-SDNYLIT-00764454	JPM-SDNYLIT-00766484
JPM-SDNYLIT-00763652	JPM-SDNYLIT-00764455	JPM-SDNYLIT-00766569

JPM-SDNYLIT-00766574	JPM-SDNYLIT-00768892	JPM-SDNYLIT-00773356
JPM-SDNYLIT-00766657	JPM-SDNYLIT-00768963	JPM-SDNYLIT-00773476
JPM-SDNYLIT-00766798	JPM-SDNYLIT-00769341	JPM-SDNYLIT-00773595
JPM-SDNYLIT-00766805	JPM-SDNYLIT-00769423	JPM-SDNYLIT-00773713
JPM-SDNYLIT-00766857	JPM-SDNYLIT-00769443	JPM-SDNYLIT-00773831
JPM-SDNYLIT-00766877	JPM-SDNYLIT-00769474	JPM-SDNYLIT-00773949
JPM-SDNYLIT-00767011	JPM-SDNYLIT-00769634	JPM-SDNYLIT-00774068
JPM-SDNYLIT-00767145	JPM-SDNYLIT-00769750	JPM-SDNYLIT-00774204
JPM-SDNYLIT-00767281	JPM-SDNYLIT-00769911	JPM-SDNYLIT-00774307
JPM-SDNYLIT-00767424	JPM-SDNYLIT-00769946	JPM-SDNYLIT-00774461
JPM-SDNYLIT-00767446	JPM-SDNYLIT-00770041	JPM-SDNYLIT-00774626
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JPM-SDNYLIT-00767508	JPM-SDNYLIT-00770482	JPM-SDNYLIT-00774973
JPM-SDNYLIT-00767597	JPM-SDNYLIT-00770502	JPM-SDNYLIT-00774992
JPM-SDNYLIT-00767621	JPM-SDNYLIT-00770562	JPM-SDNYLIT-00775011
JPM-SDNYLIT-00767626	JPM-SDNYLIT-00770662	JPM-SDNYLIT-00775041
JPM-SDNYLIT-00767686	JPM-SDNYLIT-00770692	JPM-SDNYLIT-00775081
JPM-SDNYLIT-00767844	JPM-SDNYLIT-00770725	JPM-SDNYLIT-00775111
JPM-SDNYLIT-00767963	JPM-SDNYLIT-00770757	JPM-SDNYLIT-00775118
JPM-SDNYLIT-00768057	JPM-SDNYLIT-00770782	JPM-SDNYLIT-00775137
JPM-SDNYLIT-00768136	JPM-SDNYLIT-00770805	JPM-SDNYLIT-00775172
JPM-SDNYLIT-00768203	JPM-SDNYLIT-00770827	JPM-SDNYLIT-00775187
JPM-SDNYLIT-00768362	JPM-SDNYLIT-00771149	JPM-SDNYLIT-00775219
JPM-SDNYLIT-00768503	JPM-SDNYLIT-00773075	JPM-SDNYLIT-00775248
JPM-SDNYLIT-00768533	JPM-SDNYLIT-00773204	JPM-SDNYLIT-00775278
JPM-SDNYLIT-00768648	JPM-SDNYLIT-00773207	JPM-SDNYLIT-00775304
JPM-SDNYLIT-00768664	JPM-SDNYLIT-00773209	JPM-SDNYLIT-00775311
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JPM-SDNYLIT-00768744	JPM-SDNYLIT-00773240	JPM-SDNYLIT-00775376
JPM-SDNYLIT-00768769	JPM-SDNYLIT-00773263	JPM-SDNYLIT-00775404
JPM-SDNYLIT-00768793	JPM-SDNYLIT-00773275	JPM-SDNYLIT-00787742
JPM-SDNYLIT-00768815	JPM-SDNYLIT-00773293	
JPM-SDNYLIT-00768842	JPM-SDNYLIT-00773318	
JPM-SDNYLIT-00768856	JPM-SDNYLIT-00773337	
JPM-SDNYLIT-00768868	JPM-SDNYLIT-00773340	

Dated: July 18, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2023, the foregoing document, entitled “JPMorgan Chase Bank, N.A.’s Fourth Supplemental Initial Disclosures,” was served in accordance with the Federal Rules of Civil Procedure and/or the Local Rules of the United States District Court for the Southern District of New York upon the attorneys for the Plaintiff and the Third-Party Defendant in the above-entitled action by electronic mail.

DATED: July 18, 2023
Boston, MA

By: /s/ Felicia H. Ellsworth